

## POTW PRETREATMENT PROGRAM AUDIT

Audit Date(s)	POTW Name

Contact Name	Title	Telephone	
Address			
E-Mail Address			
		Yes	No
Should this be the person on the mailing list?			

Participants				
Name		Title	Organization	Telephone
1				
2				
3				
4				
5				

NOTE: For Sections I through VIII, complete background sections based on information in pretreatment files and all other sections based on discussion with POTW personnel.

SECTION I: GENERAL INFORMATION				
A. Background - Complete prior to onsite activity				
1	Date of last annual report:			
	List unresolved issues.		•	
2	Date of last audit:			
	List unresolved issues.		•	
3	Date of last field audit:			
	List unresolved issues.		•	
4	List any other outstanding issues.			
5	Number of treatment plants (verify during onsite activity):			
NPDES Number		Issuance Date		Expiration Date
6	a. Measures of Success - Compliance with NPDES limits (measure 5)			
	Year	Category 1	Category 2	Category 3
	2012			
	2011			
	2010			
	2009			
	2008			
	b. Measures of Success - Compliance with sludge limits (measure 6)			
Year	Category 1	Category 2	Category 3	
2012				
2011				
2010				
2009				
2008				

7	Any effluent or sludge violations in the past 12 months?	Yes	No	
Parameter violated		Date(s)	Reported Cause(s)	
8	Does the permit(s) require pretreatment implementation?	Yes	No	
9	Does the permit(s) have a schedule for pretreatment program implementation/modification?	Yes	No	
Activity		Milestone Date		Completion Date
Submit list of pollutants and sampling plan				
Submit local limits reevaluation				
Submit response to comments on reevaluation				
Adopt local limits				
10	List any pending program modifications and current status (verify during onsite activity).			
11	Measures of Success - Overall Rating (measure 19 - see attachment )			

## SECTION II: LEGAL AUTHORITY

### A. Background - Complete prior to onsite activity

1 List all municipalities served by the POTW and applicable legal authorities (verify during onsite activity).

Municipality Name	Ordinance Date	Agreement Date	Any IUs? (X all that apply)		
			SIUs	IUs	None

2	Was a complete legal authority review previously conducted?	Yes	No	Date	Reviewer

Describe any inadequacies not yet corrected.

3	Has the POTW submitted legal authority revisions based on the streamlining amendments?	Yes	No

If no, attach ordinance review. If yes, list status.

4	Does the POTW's ordinance provide for variances and/or special agreements?	Yes	No

If yes, does it:

specifically prohibit changes to both categorical standards and other federal pretreatment requirements (e.g., reporting)?

establish a cap based on the current MAIL for revised local limits?

require that the revised limit or requirement be granted in writing?

B. Current			
1	Update POTW's progress on correcting deficiencies, including streamlining.		
2	Does the POTW intend to adopt any additional optional streamlining provisions?		
3	When did the POTW last review its ordinance to ensure that it is consistent with the POTW's current program implementation?		
4	Do any outside agencies implement all or part of the pretreatment program within the POTW's service area?	Yes	No
	If yes, list agency and part of program implemented.		
	If yes, how does the POTW ensure the adequacy of implementation in these areas?		

SECTION III: APPLICATION OF STANDARDS				
A. Background - Complete prior to onsite activity				
1	Has the POTW stated in any annual reports in the last five years that problems (e.g., inhibition/upset, pass through, sludge contamination, corrosion, toxic fumes, etc.) have been caused by IU discharges?	Yes	No	
	If yes, describe the incident and actions taken.			
2	a. Date of last local limits submission:			
	b. Date of acceptance:			
	c. Date of approval:			
	d. If not accepted and approved, list status:			
3	Are the approved local limits allocated in the submission or left to be allocated in the permits?			
4	Does the POTW have any BMPs approved as part of its local limits?	Yes	No	
	If yes, describe.			
5	Did the POTW include loadings from waste haulers in its local limit development?	Yes	No	N/A

6	Has the POTW received approval for removal credits?		Yes	No	
	If yes, for what pollutants.				
7	Has the POTW revised or proposed to revise its approved program to establish the classification of nonsignificant categorical industrial users?		Yes	No	
	If yes, list current status of approval.				
8	Has the POTW revised or proposed to revise its approved program to establish the classification of middle tier categorical industrial users?		Yes	No	
	If yes, list current status of approval.				
9	Has the POTW revised or proposed to revise its approved program to provide for equivalent mass limits <u>in place of</u> concentration based categorical standards?		Yes	No	
	If yes, list current status of approval.				
10	Has the POTW revised or proposed to revise its approved program to provide for equivalent concentration limits <u>in place of</u> mass based categorical standards?		Yes	No	
	If yes, list current status of approval.				
11	List all CIUs subject to production-based standards (with category):				
12	List all CIUs for which concentration-based limits were applied <u>in place of</u> mass-based standards:				
13	List all CIUs for which mass-based limits were applied <u>in place of</u> concentration-based standards:				
14	List all CIUs for which a pollutants not present waiver has been granted:				
15	Does the approved program include procedures for acceptance of hauled waste?		Yes	No	
	If yes, describe.				

16	a. Measures of Success - Influent (measure 1)			
	Year	Category 1	Category 2	Category 3
	2012			
	2011			
	2010			
	2009			
	2008			
	b. Measures of Success - Effluent (measure 2)			
	Year	Category 1	Category 2	Category 3
	2012			
	2011			
	2010			
	2009			
	2008			
	c. Measures of Success - Sludge (measure 3)			
	Year	Category 1	Category 2	Category 3
	2012			
	2011			
	2010			
	2009			
	2008			
	d. Measures of Success - Data/Local Limits (measure 4)			
	Year	Category 1	Category 2	Category 3
	2012			
	2011			
	2010			
	2009			
	2008			
B. Industrial User Characterization				
1	When was the last full IWS completed?			

2	How does the POTW locate new IUs?			
3	How does the POTW investigate changes at existing IUs (e.g., non-SIU to SIU, NSIU to CIU)?			
4	How are changes discovered in contributing jurisdictions?			
5	Does the POTW maintain a list of non-SIUs?	Yes	No	Update freq.

### C. Local Limits

1	Is the POTW aware of instances of pass through, treatment plant inhibition/upset, sludge contamination, or other problems (excessive corrosion, toxic fumes, sewer blockages, etc.) during the past year, including problems caused by conventional wastes?		Yes	No	
	If yes, describe incident and actions taken.				
2	Is the POTW aware of any instances where workers have experienced industrial waste-related injuries or illnesses?		Yes	No	
	If yes, describe.				
3	If the POTW allocates local limits through the permits, do they have a mechanism to track the allocations?		Yes	No	N/A
	If yes, describe.				
4	Has the POTW encountered any problems implementing applicable BMPs?		Yes	No	N/A
	If yes, describe.				
5	What has the POTW done to address category 2 or 3 ratings (most recent year) for influent, effluent, and sludge?				

### D. Standards and Requirements for IUs

1	Does the POTW report any questions/problems in the categorization of IUs?		Yes	No	
	If yes, describe.				
2	List all IUs where the combined wastestream formula was applied.				

3	Does the POTW have a list of new source dates for all categorical industries?		Yes	No	
4	Has the POTW made a specific evaluation of process construction dates in relation to the new source date of any applicable categorical standards?		Yes	No	N/A
5	List all IUs currently regulated under Pretreatment Standards for New Sources.				
6	If present <sup>1</sup> , does the POTW regulate CIUs for which a no discharge standard exists?				
7	Has the POTW applied equivalent concentration limits to any users subject to mass-based standards <u>in place of</u> mass limits, other than those listed in Section A.12?		Yes	No	N/A
	If yes, describe.				
8	Has the POTW applied equivalent mass limits to any users subject to concentration-based standards <u>in place of</u> concentration limits, other than those listed in Section A.13?		Yes	No	N/A
	If yes, describe.				
9	Has the POTW granted any net/gross variances?		Yes	No	
	If yes, describe.				
<b>E. Hauled Wastes</b>					
1	Does the POTW accept wastes by truck, rail or dedicated pipe (If no, go to Section V)		Yes	No	
	What types of waste are accepted?				
2	Are any hauled wastes hazardous?		Yes	No	
	If no, how does the POTW confirm this?				
3	Has the POTW designated a specific discharge point(s) for the waste (403.5(b)(8))?		Yes	No	
	If yes, where?				

<sup>1</sup> CIUs with standards requiring no discharge include: feedlots, inorganic chemicals manufacturing, fertilizer manufacturing, iron & steel manufacturing, nonferrous metals manufacturing, steam electric power generating, timber products, oil & gas extraction, paint formulating, ink formulating, pesticide chemicals, battery manufacturing, metal molding & casting, porcelain enameling, aluminum forming, and nonferrous metals forming & metal powders.

4	Does the POTW have a control mechanism for regulating the waste (403.8(f)(1)(iii))?		Yes	No	
	If yes, describe the mechanism and to whom it is issued.				
5	Does the control mechanism include all applicable categorical and local standards (403.8(f)(2)(iii))?		Yes	No	N/A
6	Does the POTW sample/require sampling of hauled waste?		Yes	No	
	If yes, describe the sampling program.				

SECTION IV: CONTROL MECHANISM							
A. Background - Complete prior to onsite activity							
1	Provide the # of IUs based on the most recent file information:	SNIUs	CIUs	MTCIUs	NSCIUs	Other	Total
2	a. List all SIUs without control mechanisms or with expired control mechanisms (and the date of expiration).						
	b. Identify which of these users have administratively extended control mechanisms.						
3	According to the approved program, what type of control mechanism was intended to be used to regulate industrial discharges?						
4	What industries does the approved program indicate will be regulated through this control mechanism?						
5	What is the maximum control mechanism duration indicated in the approved program?						
6	Has the POTW revised or proposed to revise its approved program to allow for general control mechanisms?				Yes	No	
	If yes, list current status of approval.						
7	Does the annual report indicate that any users are covered by a general control mechanism?				Yes	No	
	If yes, list the users that are covered by each general control mechanism.						
8	Measures of Success - Permit issuance rate (measure 13 - see attachment )						

B. Control Mechanism							
1	Give the current # of IUs:	SNIUs	CIUs	MTCIUs	NSCIUs	Other	Total
2	Have all expired SIU control mechanisms been re-issued?				Yes	No	N/A
	If no, explain.						
3	What type of control mechanism is currently being used?						
4	Has the POTW issued any general control mechanisms other than those listed in Section A.7?				Yes	No	
	If yes, list the users that are covered by each additional general control mechanism.						

SECTION V: COMPLIANCE MONITORING					
A. Background - Complete prior to onsite activity					
1	As required by the approved program, list the frequency for:	SNIU	CIU	MTCIU	NSCIU
	POTW sampling of IUs				
	POTW inspection of IUs				
	IU self-monitoring				
	IU reporting				
2	In the last year, indicate frequency of:	SNIU	CIU	MTCIU	NSCIU
	POTW sampling of IUs				
	POTW inspection of IUs				
	IU self-monitoring				
	IU reporting				
	If less than required by the approved program or less than 1/yr (403.8(f)(2)(v)), explain.				

3	List all SIUs that were found to have been not sampled or not inspected in the last annual report.			
Name of IU		NS/NI/B <sup>2</sup>	Reason	
4	Has the POTW revised or proposed to revise its approved program to provide for waivers for pollutants not present?		Yes	No
If yes, list current status of approval.				
5	Has the POTW granted any monitoring waivers for pollutants not present?		Yes	No
If yes, list the user and the pollutants for which the waiver was granted.				
6	Measures of Success - Sampling and Inspection Coverage (measures 11 and 12 - see attachment )			
<b>B. POTW Sampling and Inspection</b>				
1	Update status of users listed in the table in A.3:			
Name of IU		NS/NI/B	Date planned/completed	
2	Does the POTW conduct all of the sampling for any of its users?		Yes	No
	If yes, does the POTW re-sample within 30 days of discovering a violation?		Yes	No
				N/A

<sup>2</sup> NS = not sampled, NI = not inspected, B = both not sampled and not inspected.

3	Does the POTW monitor for all categorical pollutants at least once per year?	Yes	No	
	If no, why not?			
	Does the POTW monitor for all local limit pollutants at least once per year?	Yes	No	
	If no, how does the POTW determine which pollutants to sample?			
4	For users with a monitoring waiver for pollutants not present, how often does the POTW monitor for the waived pollutants?			
5	Does the POTW have written standard operating procedures for sampling industrial users?	Yes	No	
6	Does the POTW collect its own samples, or are they collected by a contractor?			
7	Are pH, oil & grease, cyanide, volatile organics, total phenol, sulfide, and hexavalent chromium collected by grab sample?	Yes	No	N/A
8	When collecting grab samples, how many grab samples are used?			
	Has the POTW documented the reasons for the number of grab samples used for each IU?			
9	Are composite samples used for all other pollutants to evaluate compliance with:	Yes	No	N/A
	Categorical standards?			
	Local limits?			
	Is any unannounced sampling conducted?			
10	Is POTW prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. available)?			
11	How much time normally elapses between sample collection and obtaining analytical results?			
12	Has the POTW evaluated all of its users for the need for a slug control plan?	Yes	No	
13	Has the POTW documented and maintained the documentation of the slug control evaluations?	Yes	No	N/A

14	What factors does the POTW consider in determining whether a user is required to develop a slug/spill control plan?				
15	Do the POTW's annual inspections include an evaluation of facility changes that might impact the need for a slug control plan?	Yes	No		
16	Does the POTW have procedures (e.g., identify waste, response personnel, identify key manholes, etc.) and equipment to investigate causes and sources of unknown slugs/spills to the POTW (including collection system)?	Yes	No		
If yes, describe.					
<b>C. IU Self-Monitoring and Reporting</b>					
1	When are user self-monitoring reports due (e.g., 30 days after the monitoring period)?				
2	How does the POTW verify that IUs report all sample results if they sample more frequently than required?				
3	Do any IUs discharge hazardous waste?		Yes	No	
	If no, how does POTW verify this?				
	If yes, has the IU submitted the proper notifications (403.12(p))?		Yes	No	N/A
4	Does the POTW have procedures to monitor and control IUs when they close?		Yes	No	
	If yes, describe.				

<b>SECTION VI: ENFORCEMENT</b>					
<b>A. Background - Complete prior to onsite activity</b>					
1	Has the POTW revised its approved ERP based on the new SNC definition?		Yes	No	N/A
If yes, does it include all of the changes or only the required changes?					

2	Based on the most recent file data, list the SIUs in SNC (indicate period).				
	Name of IU	1st quarter of SNC	SNC parameters	Describe enforcement taken with date	Scheduled compliance date
3	Measures of Success - SNC rates (measures 7, 8, 9, and 10 - see attachment )				
B. Enforcement					
1	When the POTW receives IU self-monitoring reports, how does it evaluate user compliance, including limits, completeness and timeliness of reports, and submission of resampling data?				
	When does this evaluation occur?				
2	How often does the POTW evaluate for SNC?				
3	Does the POTW document its SNC evaluation?				
	For what period was the last evaluation completed?				
4	Is the POTW using the new SNC definition? If yes, describe which parts of the new definition are used.				
5	Have there been instances where the POTW found the responses in its ERP to be inappropriate?			Yes	No
	If yes, explain.				
6	Has POTW taken enforcement against all instances of pass through/interference in the last year?			Yes	No
	If no, why?				
	If yes, describe.				

7	Update based on most recent SNC period (identify period).			
Name of IU	1st quarter of SNC	SNC parameters	Describe enforcement taken with date	Scheduled compliance date

SECTION VII: DATA MANAGEMENT AND PUBLIC PARTICIPATION				
A. Data Management				
1	Are all records maintained for at least 3 years?	Yes	No	
2	How does the POTW keep up-to-date on regulations and technical guidance for the pretreatment program?			
B. Public Participation				
1	Are records available to the public (403.14(c))?	Yes	No	
2	Have IUs requested that data be kept confidential?	Yes	No	
	If yes, what type of data was it, and how has the POTW handled it?			

SECTION VIII: PROGRAM RESOURCES	
1	Approximately how many person-years does the POTW devote to the pretreatment program?
2	In what areas does the POTW need additional resources?
3	What additional activities (if any) has the POTW undertaken to further the goals of the pretreatment program?

4	What has the POTW done to incorporate P2 practices into its pretreatment program?	
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## SECTION IX: INDUSTRIAL USER FILE EVALUATION

IU Name			
Category		PWF <sup>3</sup>	
Address			
Comments			
IU Name			
Category		PWF[ NOTEREF _Ref252539 839 \h \* MERGEFO RMA T ]	
Address			
Comments			
IU Name			
Category		PWF[ NOTEREF _Ref252539 839 \h \* MERGEFO RMA T ]	
Address			
Comments			

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<sup>3</sup> Process waste flow

IU Name			
Category		PWF[ NOTEREF _Ref252539 839 \h \* MERGEFO RMAT ]	
Address			
Comments			

**NOTE:** Complete all questions with a "Y" (yes), "N" (no), "N/A" (not applicable), "U" (unable to determine), the appropriate number, or as directed in the question. Note that a copy of a typical permit should be obtained for the complete permit form review which is done separately and included as an attachment to the report.

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
<b>A1. Industrial User Characterization</b>				
1. Is the IU categorical (CIU), non-significant categorical (NSCIU), middle-tier categorical (MTCIU), significant non-categorical (SNIU) or other (O)?				
2. Is the IU properly categorized?				
<b>A2. Non-Significant Categorical Industrial Users (complete past #1 only if the user is designated as an NSCIU)</b>				
1. Has the user been designated as an NSCIU?				
2. If yes, is there documentation in the file that shows that the user:				
➤ never discharges more than 100 gpd of categorical wastewater?				
➤ never discharges any untreated concentrated wastewater?				
➤ consistently complied with all applicable pretreatment standards and requirements prior to and since the designation?				
3. Has the user submitted the annual certification required by 403.12(q)?				
4. Are certifications signed by a responsible corporate official or authorized representative?				
5. If applicable, was the authorization made in writing?				
<b>A3. Middle-Tier Categorical Industrial Users (complete past #1 only if the user is designated as a MTCIU)</b>				
1. Has the user been designated as a MTCIU?				
2. If yes, is there documentation in the file that shows that:				
➤ the user's total categorical wastewater flow does not exceed:				
- 0.01% of the dry weather hydraulic capacity of the POTW or 5000 gpd whichever is smaller?				
❖ if yes, is the flow determination based on a continuous effluent flow monitoring device?				
- 0.01% of the design dry weather organic treatment capacity of the POTW?				
- 0.01% of the MAHL for any categorical pollutant?				
➤ the user has not been in SNC since at least two years prior to its designation as a MTCIU?				
➤ the user does not have flow rates, production levels, or pollutant levels that vary so significantly that the MTCIU designation is inappropriate?				

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
3. Has the documentation been maintained for at least three years after expiration of the control mechanism?				
<b>B. Application of Standards</b>				
1. Were local limits and/or categorical standards properly applied?				
2. If applicable, were production-based standards correctly applied?				
3. If applicable, was the combined wastestream formula correctly applied?				
4. If applicable, were TTO requirements or alternatives correctly applied?				
5. Does the control mechanism include BMPs in place of local limits?				
➤ If yes, is the BMP authorized in the POTW ordinance?				
<b>C1. Control Mechanism (also obtain a copy of a typical permit for the permit form review)</b>				
1. Does the file contain:				
➤ an updated control mechanism application and/or survey questionnaire?				
➤ a current control mechanism?				
➤ documentation <sup>4</sup> of how control mechanism limits and requirements were established?				
2. Is the user regulated through an individual control mechanism (ICM) or general control mechanism (GCM)?				
3. Does the control mechanism include:				
➤ limits for all categorical and local limit pollutants?				
➤ all applicable slug control requirements?				
➤ all applicable BMP requirements?				
➤ monitoring requirements for all categorical and local limit pollutants?				
- if no, is there documentation of the reasons for excluding specific pollutants?				
➤ sampling location and frequency?				
➤ sample type, including appropriate use of grab and composite samples?				
- if used, is there documentation on the use of time-proportional or grab samples in place of flow-proportional samples?				

<sup>4</sup> Categorization, new source, combined wastestream formula, production based standards, monitoring frequency, comparison of local limits to categorical standards, etc.

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
➤ if the user is an MTCIU, the requirement for notification of changes causing it to no longer meet the MTCIU criteria?				
➤ a compliance schedule?				
- if yes, does it stay applicability of permit requirements?				
4. Is the permit effective for 5 years or less?				
5. In the inspector's opinion, is the sample frequency sufficient to determine compliance?				
<b>C2. General Control Mechanism (complete past #1 only if the user has been issued a general control mechanism)</b>				
1. Is the user covered by a general control mechanism?				
2. If yes, does POTW documentation include:				
➤ copy of general permit?				
➤ user's request for coverage?				
➤ demonstration that user meets eligibility criteria including:				
- similar types of operations as other covered users?				
- same types of waste as other covered users?				
- same effluent limits as other covered users?				
- same or similar monitoring as other covered users?				
- user not subject to production-based standards, mass-based standards, CWF, or net gross variance?				
➤ demonstration that user appropriately covered by general permit?				
3. Has the documentation been maintained for at least 3 years after expiration of the control mechanism?				
4. Did the user file a written request for coverage that identified its:				
➤ contact information?				
➤ production processes?				
➤ types of waste generated?				
➤ monitoring location?				
<b>C3. Equivalent Mass Limits (complete past #1 only if the user has been issued equivalent mass limits in place of concentration based categorical standards)</b>				
1. Has the user been issued equivalent mass limits in place of concentration based categorical standards?				

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
2. If yes, has the POTW issued mass limits only for pollutants for which mass limits are appropriate (excludes pH, temperature, radiation, and other similar pollutants)?				
3. Did the user submit documentation that establishes:				
➤ that it employs water conservation?				
➤ that it uses treatment adequate to achieve compliance?				
➤ that it does not use dilution?				
➤ the average daily flow based on monitoring?				
➤ the long-term production rate?				
➤ that its flow, production, and pollutant levels do not vary significantly?				
➤ that it has consistently complied with categorical standards?				
4. Were limits calculated based on actual average daily flow?				
5. Did the POTW reassess the limits based on changes in production?				
6. Were mass limits retained in subsequent control mechanisms?				
➤ If yes, was there a change in average flow from the previous control mechanism?				
- If yes, is there documentation that the flow reduction was solely the result of water conservation?				
7. Is there documentation in the file that demonstrates that the user:				
➤ has maintained and operated its treatment equipment?				
➤ uses continuous flow monitoring?				
➤ records and reports production rates?				
➤ has provided notification where production rates have varied by more than 20% from the production rate used at the time that the mass limits were established?				
➤ continues to employ water conservation?				
C4. Equivalent Concentration Limits (complete past #1 only if the user has been issued equivalent concentration limits in place of mass based categorical standards)				
1. Has the user been issued equivalent concentration limits in place of mass based categorical standards?				
2. If yes, is the user subject to a categorical standard other than 40 CFR 414, 419, or 455?				

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
3. Does the control mechanism include the concentration limits from the categorical standard?				
4. Is there documentation that the user does not use dilution?				
C5. Pollutants Not Present (complete past #1 only if the user has been granted a monitoring waiver for pollutants not present)				
1. Has the user has been granted a monitoring waiver for pollutants not present for any pollutants regulated by an applicable categorical standard?				
2. If yes, has the user demonstrated through sampling and other technical factors that the pollutant is neither present nor expected to be present?				
3. Does the user's request for the waiver include:				
➤ at least one sample result prior to treatment that is representative of all process wastestreams?				
➤ use of non-detectable results only where the approved test method with the lowest detection level is used?				
➤ appropriate signature and certification?				
4. Is the waiver included in the user's control mechanism?				
5. Is the waiver valid for no longer than the user's current control mechanism?				
6. Does the control mechanism require the user to:				
➤ notify the POTW if the pollutant is found or expected to be present?				
➤ begin at least semiannual monitoring if pollutant is found or expected to present?				
7. Has the user reapplied for the waiver with each subsequent control mechanism application, including new data?				
8. Has documentation of the granting of the waiver been maintained for at least 3 years after expiration of the waiver?				
9. Has the user submitted the required certification with each self-monitoring report?				
D. POTW Inspections of IUs				
1. How many POTW inspections were conducted and documented in the last 12 months?				
2. Does the inspection report include:				
➤ inspector name?				
➤ inspection date/time?				

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
➤ name of IU official contacted?				
➤ evaluation of manufacturing facilities?				
➤ evaluation of discharge of process baths or other chemicals?				
➤ verification of production data if needed?				
➤ identification of wastewater sources, flow and types <sup>5</sup> of discharge?				
➤ evaluation of pretreatment facilities?				
➤ evaluation of chemical storage areas?				
➤ evaluation of spill/slug control procedures?				
➤ if applicable, evaluation of compliance with BMPs?				
➤ evaluation of general housekeeping?				
➤ potential hazardous waste discharge?				
➤ evaluation of self-monitoring equipment and techniques?				
➤ evaluation of lab procedures?				
➤ evaluation of monitoring records?				
<b>E. POTW Sampling of IUs</b>				
1. How many sampling visits were conducted and documented in the last 12 months?				
2. Do the sampling reports include:				
➤ all analytical results?				
➤ name of sampling personnel?				
➤ sample date/time?				
➤ sample type?				
➤ sample location?				
➤ wastewater flow during sampling?				
➤ sample preservation?				
➤ chain of custody?				
➤ analytical methods used?				
➤ analysis date?				

<sup>5</sup> continuous, intermittent, batch, etc.

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
➤ name of analyst?				
3. Were all regulated parameters monitored?				
4. Were 40 CFR 136 analytical methods used?				
5. If POTW does not require self-monitoring, has the POTW resampled within 30 days after a violation?				
<b>F. IU Self-Monitoring and Reporting</b>				
1. Has the IU submitted all required self-monitoring reports in the last 12 months?				
2. Did the report include measured or estimated flow data?				
3. Were all regulated parameters monitored at the required frequency?				
4. If applicable, was information provided to determine compliance with applicable BMPs?				
5. Is there documentation that the IU notified the POTW within 24 hours of becoming aware of a violation?				
6. Has the IU resampled and reported within 30 days after a violation?				
7. Are reports signed and certified by a responsible corporate official or authorized representative?				
8. If applicable, was the authorization made in writing?				
<b>G. Slug/Spill Control</b>				
1. Is there documentation in the file that the POTW conducted a slug evaluation?				
2. If yes, does it include an inventory of process baths and other chemicals on site along with an evaluation of the potential for discharge of those baths and chemicals?				
3. Have any slugs/spills been documented in the file?				
4. If yes, did the user provide 24-hour notification?				
5. Was there a written report from the user addressing the slug/spill including:				
➤ cause of the slug/spill?				
➤ steps taken to minimize damage from the slug/spill?				
➤ steps taken to ensure that the slug/spill does not recur?				
6. Did the POTW require development of a slug/spill control plan?				

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
7. Has the IU developed a slug/spill control plan?				
8. Does the slug/spill plan contain:				
➤ description of discharge practices?				
➤ description of stored chemicals?				
➤ procedures to prevent slugs/spills?				
➤ procedures to notify POTW of slugs/spills?				
➤ follow-up practices to minimize damage from slugs/spills?				
<b>H. Enforcement</b>				
1. Did the POTW respond to all IU violations in the last 12 months?				
2. Was SNC status correctly reported on last AR?				
3. Is the IU currently in SNC?				
4. Is the IU under a formal enforcement action?				
5. Did the POTW escalate action in accordance with the ERP?				
<b>I. Summary</b>				
1. Is the file well organized and readily accessible?				
2. Does the file indicate that the POTW has implemented only those streamlining options for which is has obtained approval?				

## SECTION X: FINDINGS, REQUIREMENTS, AND RECOMMENDATIONS

### A. Legal Authority

1. Findings on POTW's legal authority. \_\_\_\_\_
2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:
  -
3. To improve its pretreatment program, it is recommended that the POTW do the following:
  -

### B. Application of Standards

1. Findings on POTW's application of standards. \_\_\_\_\_
2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:
  -
3. To improve its pretreatment program, it is recommended that the POTW do the following:
  -

### C. Control Mechanism

1. Findings on the POTW's control mechanism. \_\_\_\_\_
2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:
  -
3. To improve its pretreatment program, it is recommended that the POTW do the following:
  -

D. Compliance Monitoring

1. Findings on POTW's compliance monitoring program. \_\_\_\_
2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:
  -
3. To improve its pretreatment program, it is recommended that the POTW do the following:

-

E. Enforcement

1. Findings on the POTW's enforcement. \_\_\_\_\_
2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:
  -
3. To improve its pretreatment program, it is recommended that the POTW do the following:

-

F. Data Management and Public Participation

1. Findings on data management and public participation. \_
2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:
  -
3. To improve its pretreatment program, it is recommended that the POTW do the following:

-

G. Resources

1. Findings on the POTW's resources. \_\_\_\_\_

2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:
  -
3. To improve its pretreatment program, it is recommended that the POTW do the following:
  -

### **Attachments**

#### **- Pretreatment Audit Measures Charts**

##### **- File Review Worksheets**

##### **- Permit Form Review**

##### **- Industrial Inspection Reports**

##### **- Audit Action Items**